

1 Joseph R. Ganley (5643)
Piers R. Tueller (14633)
2 HUTCHISON & STEFFEN, PLLC
Peccole Professional Park
3 10080 West Alta Drive, Suite 200
Las Vegas, Nevada 89145
4 Telephone: (702) 385-2500
5 Facsimile: (702) 385-2086
jganley@hutchlegal.com
6 ptueller@hutchlegal.com

7 Ed Nelson, III (*Pro hac vice forthcoming*)
NELSON BUMGARDNER CONROY PC
8 3131 West 7th Street, Suite 300
9 Fort Worth, TX 76107
ed@nelbum.com

10 *Attorney for defendant*

11
12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 ALLEGIANT TRAVEL COMPANY,

15 Plaintiff,

16 v.

17 R2 SOLUTIONS LLC,

18 Defendant.
19

Case No. 2:22-cv-00828-CDS-BNW

**UNOPPOSED MOTION TO EXTEND R2
SOLUTIONS LLC'S TIME
TO RESPOND TO PLAINTIFF'S
COMPLAINT**

(First Request)

20
21 Defendant R2 Solutions LLC ("Defendant") brings this unopposed motion to extend the
22 time for it to respond to Plaintiff Allegiant Travel Company's ("Plaintiff") Complaint for
23 Declaratory Judgment of Non-Infringement (ECF 1). To this end, Defendant requests, and
24 Plaintiff does not oppose, an extension of thirty (30) days to and including **July 16, 2022** to do so.
25 Pursuant to LR IA 6-1, this is the first request to extend the time to respond to Plaintiff's
26 complaint.

27 This request is not made for the purpose of delay. Patent cases are complex. Plaintiff's
28 Complaint involves seven distinct patents, at least three of which have not been litigated in prior

1 patent infringement litigation brought by Plaintiff in the United States District Court for the
2 Eastern District of Texas. As such, there is much for Defendant's counsel to consider in advance
3 of Defendant's response.

4 Because patent cases are complex, minimum 30-day extensions like the one requested here
5 are routine. Knowing that additional time would be necessary, Defendant's counsel approached
6 Plaintiff's lead counsel about such an extension via email on May 31, 2022. *See* Exh. A.
7 Plaintiff's counsel replied that Plaintiff does not oppose a 30-day extension. *Id.*

8 Complicating this case further is the fact that it is a declaratory judgement action with
9 complex jurisdictional issues and the presence of a mutual non-disclosure agreement, all of which
10 need to be properly investigated and addressed, as necessary or appropriate.

11 ///

13 ///

15 ///

17 ///

19 ///

21 ///

23 ///

25 ///

27 ///

1 For the foregoing reasons, Defendant respectfully asks that the Court grant this unopposed
2 motion re-setting Defendant's deadline to respond to Plaintiff's complaint to July 16, 2022.

3 Dated this 16th day of June, 2022.

4 HUTCHISON & STEFFEN, PLLC

5 /s/ Joseph R. Ganley

6 _____
7 Joseph R. Ganley (5643)
8 Piers R. Tueller (14633)
9 Peccole Professional Park
10 10080 West Alta Drive, Suite 200
11 Las Vegas, Nevada 89145
12 jganley@hutchlegal.com
13 ptueller@hutchlegal.com

14 Ed Nelson, III (*Pro hac vice forthcoming*)
15 Nelson Bumgardner Conroy PC
16 3131 West 7th Street, Suite 300
17 Fort Worth, Texas 76107
18 ed@nelbum.com

19 *Attorneys for defendant*
20 *R2 Solutions LLC*

21 **IT IS SO ORDERED.**

22 DATED: June 21, 2022

23 
24 _____
25 UNITED STATES MAGISTRATE JUDGE
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of June, 2022, I caused a true and correct copy of the foregoing **UNOPPOSED MOTION TO EXTEND R2 SOLUTIONS LLC'S TIME TO RESPOND TO PLAINTIFF'S COMPLAINT** to be submitted electronically for filing and service with the United States District Court for the District of Nevada via the Electronic Filing System to the following:

Patrick H. Hicks (4632)
Kelsey E. Stegall (14279)
LITTLER MENDELSON, P.C.
3960 Howard Hughes Parkway, #300
Las Vegas, Nevada 89169
phicks@littler.com
kstegall@littler.com

and via Email to:

Michael A. Oblon
JONES DAY
51 Louisiana Avenue, N.W.
Washington, D.C. 20001
moblon@jonesday.com

Keith Davis
JONES DAY
2727 North Harwood
Dallas, Texas 75201
kbdavis@jonesday.com

H. Albert Liou
JONES DAY
717 Texas Avenue, Suite 3300
Houston, Texas 77002
aliou@jonesday.com

Attorneys for plaintiff
Allegiant Travel Company

/s/ Kaci Chappuis

An employee of Hutchison & Steffen, PLLC